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7
8 **DISTRICT COURT
DISTRICT OF NEVADA**

9 MITCHELL E. HARPER,

10 Plaintiff,

11 vs.

12 NEVADA PROPERTY 1, LLC dba
COSMOPOLITAN OF LAS VEGAS,

13 Defendants.
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CASE NO.: 2:19-cv-02069-GMN-VCF

**FILED UNDER SEAL UNDER
COURT ORDER (ECF NO. 38)**

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
PLAINTIFF TO FILE RESPONSE
TO DEFENDANT'S MOTION TO
ENFORCE EARLY NEUTRAL
EVALUATION SETTLEMENT
AGREEMENT AND REQUEST
FOR EVIDENTIARY HEARING**

(FIRST REQUEST)

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19 Plaintiff MITCHELL E. HARPER and Defendant NEVADA PROPERTY 1, LLC, by
20 and through their counsel of record, hereby stipulate and agree to extend the time for Plaintiff
21 to file a response to Defendant's Motion to Enforce Early Neutral Evaluation Settlement
22 Agreement and Request for Evidentiary Hearing. Plaintiff was served on December 14, 2020.
23 Plaintiff's responsive pleading is currently due on December 28, 2020.
24

Plaintiff and Defendant have agreed to an extension of time for Plaintiff to file a response to the Motion to Enforce for the following reasons: undersigned Plaintiff's counsel's, Jenny L. Foley, young son had oral surgery the week before Christmas. Upon review of Defendant's Motion to Enforce, Ms. Foley also needed to consult with HKM Employment Attorneys LLP ethics counsel. According, Ms. Foley requested a one-week extension for Plaintiff to file a response to Defendant's Motion to Enforce, and Defendant's counsel graciously agreed to the extension.

Defendant shall, therefore, have a one (1) weeks extension from the current deadline to file a responsive pleading to Defendant's Motion to Enforce, and Plaintiff's responsive pleading shall be due on January 4, 2021.

This stipulation and order is sought in good faith and not for the purpose of delay. No prior request for any extension of time has been made.

Dated this 29th day of December, 2020.

**HKM EMPLOYMENT
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ORDER

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: December 30, 2020